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February 14, 2013

Ms. Ashley Carter
Senior Campaign Finance Analyst
Federal Election Commission
Washington, DC 20463

Committee ID: C00521013

RE: Amended July Quarterly Report (04/01/2012-06/30/2012), Filed 10/11/2012

Dear Ms. Carter,

I am writing as counsel to Florida Freedom PAC (FFP) in response to the Commission's request for additional information related to several items disclosed on the committee's Amended July Quarterly Report.

The Commission inquired about a decrease in disbursements on Line 21b of the Detailed Summary Page and an increase in debts on Line 10 of the Detailed Summary Page. As the committee acknowledged to the Commission in an October 11, 2012,

response to the September 6, 2012, Request for Additional Information to the original July report, the increase in disbursements stems from using the incorrect data from the committee's accounting software to compile the July Report. After an internal review of the committee's second quarter activity, the committee determined that the original July Quarterly Report contained transactions that were disclosed as actual disbursements when they should have been reported as memo items. Subsequently, when the amended report was filed, an adjustment to the debt schedule was required because of the addition of these memo-entried disbursements.

The Commission has also suggested that the committee did not file a 48-hour notice to appropriately disclose an independent expenditure. As the committee detailed in its response to the Commission's Request for Additional Information for the original July report: ""Because the committee lacks the day-by-day data of its expenditures or the in-kind support received from SEIU PEA for June, FFP is not able to produce, at this time, the accurate 48-hour reports that should have been filed. In any event, all of these independent expenditures have since been reported in the July quarterly report (including clarifications made in the amended report). For these reasons, FFP suggests that it would be impossible and would serve no policy purpose to attempt to produce these 48-hour reports now, after the fact. However, should the Commission find the filing of such a 48-hour report to be necessary, we would suggest that the committee file a single 48-hour report for all of these independent expenditures.""

In addition, the Commission asked about an independent expenditure that was disclosed as a memo entry on Schedule E supporting Line 24 that does not appear on Schedule D supporting Line 10. The committee is filing a second amended report to ensure that the correct debts are disclosed.

If you have any further questions regarding this matter, please feel free to contact me at 202-328-3500.

Very truly yours,

John Pomeranz
Counsel to Florida Freedom PAC

cc: Gihan Perera, Treasurer, Florida Freedom PAC
